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MARK RIDLEY-THOMAS

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September 10, 2013

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County of Los Angeles
Airport Land Use Commission
320 West Temple Street, Room 1350
Los Angeles, California 90012

RE: Impasse Appeal Cases related to Los Angeles International Airport (LAX)

Dear Chairman Louie and Commissioners:

I am writing to urge a denial of the appeal brought by the cities of Culver City and Ontario and the County of San Bernardino relative to the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS).

Approval of the appeal will negatively impact ongoing discussion regarding connecting LAX to the Metropolitan Transportation Authority (Metro) regional rail transit system. LAX remains an exception among US and world airports that have fully integrated regional rail transportation systems as an effective means of public access. This deficiency must be addressed if we are to have any success in achieving a level of job growth critical to the health and vitality of the region.

Connecting LAX to the Metro rail system reduces congestion and improves air quality. This transit connection is also important as we discuss regionalization. Transit into the airport advances the objective of regionalization in addition to the other efforts LAX is pursuing.

Delay of the SPAS further impedes long-delayed efforts to modernize LAX, addressing well-known public safety issues, and securing final approval and funding for projects designed to address operational inefficiencies, traffic congestion, and air quality issues. Granting the appeal will result in further delays to significant improvements including the Intermodal Transportation Facility, the Consolidated Rental Car facility, local roadway and intersection improvements and upgrading of passenger terminal facilities. These improvements represent thousands of construction and permanent jobs for area residents as well as surface transportation alternatives for LAX air passengers and employees.

Granting the appeal would be inconsistent with the purpose and intent of the State Aeronautics Act (SAA) and ALUC's Review Procedures. The SPAS is fully consistent with SAA in that it ensures an "orderly expansion of airports and the adoption of land use measures that minimizes the public's exposure to excessive noise and safety hazards within areas around the public airport...." More important, the SPAS does not constitute a specifically authorized "project" that can be funded and constructed without the need for further public review or consideration of alternatives. To the contrary, LAWA has acknowledged that extensive public review and comment on significant new construction projects will be afforded the public and affected stakeholders. Consistent with the California Quality Act (CEQA) and the National Environmental Policy Act (NEPA), a full vetting of alternatives will be conducted, including the "No Project/No Action" Alternative to the LAWA "Staff-Recommended Alternative" to increase the separation of the LAX North Runways, the primary focus of the appeal.

The Commission will have an opportunity to review proposed projects under the LAX SPAS Program EIR, in particular any plan to relocate the LAX North Runways. Relocation of the runway will require a permit approval by the Public Utilities Commission, and trigger a review by ALUC (PUC section 21664.5; Review Procedures section 1.5.1(d)). The City Council will be directly involved in this process, affording the general public and stakeholders opportunities to comment and express their views on the adequacy of LAWA's identification of alternatives and environmental analysis.

Finally, in correspondence to ALUC from the Los Angeles World Airports (LAWA) dated August 28, 2013 and September 10, 2013, LAWA has agreed to study alternatives to the reconfiguration of the LAX North Runways. A thorough study of alternatives is required by both State (California Environmental Quality Act) and federal law (National Environment Policy Act), and is essential before any funding commitments can be secured to alter the runway, or construct any of the other improvements needed at LAX. LAWA has not only acknowledged this legal requirement but understands that there will be a thorough public review and vetting of all alternatives, requiring LAWA to "return to the ALUC for review of the proposal for consistency with ALUP." LAWA's commitment to study alternatives effectively addresses the basis for the impasse and resolves the matter before the Commission.

Thank you for your attention to this matter. I look forward to a resolution of this matter that encourages progress toward a much improved Los Angeles International Airport.

With hope,



MARK RIDLEY-THOMAS

Chairman of the Board
Supervisor, Second District

cc: Richard Bruckner, Director, Department of Regional Planning